

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

FEB 14 2019

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

JERMEL RUSH,

Defendant.

4:19CR132 AGF/NAB

INDICTMENT

COUNT ONE

The Grand Jury charges that:

On or about June 21, 2018, in the City of St. Louis, within the Eastern District of Missouri,

JERMEL RUSH,

the defendant herein, did obstruct, delay, or affect commerce or the movement of any article or commodity in commerce or attempt to do so by robbery of the Family Dollar located at 4487 Natural Bridge, St. Louis, Missouri, 63115, a commercial establishment engaged in interstate or foreign commerce and in the business of buying and selling articles and commodities that have been previously transported in interstate or foreign commerce.

In violation of Title 18, United States Code, Section 1951(a) and (b), and punishable under Title 18, United States Code, Section 1951(a).

COUNT TWO

The Grand Jury further charges that:

On or about July 6, 2018, in the City of St. Louis, within the Eastern District of Missouri,

JERMEL RUSH,

the defendant herein, did obstruct, delay, or affect commerce or the movement of any article or commodity in commerce or attempt to do so by robbery of the Save a Lot grocery store at 3645 Page Ave., St. Louis, Missouri, 63113, a commercial establishment engaged in interstate or foreign commerce and in the business of buying and selling articles and commodities that have been previously transported in interstate or foreign commerce.

In violation of Title 18, United States Code, Section 1951(a) and (b), and punishable under Title 18, United States Code, Section 1951(a).

COUNT THREE

The Grand Jury further charges that:

On or about October 9, 2018, in the City of St. Louis, within the Eastern District of Missouri,

JERMEL RUSH,

the defendant herein, did obstruct, delay, or affect commerce or the movement of any article or commodity in commerce or attempt to do so by robbery of the Family Dollar located at 4314 N. Grand, St. Louis, Missouri, 63107, a commercial establishment engaged in interstate or foreign commerce and in the business of buying and selling articles and commodities that have been previously transported in interstate or foreign commerce.

In violation of Title 18, United States Code, Section 1951(a) and (b), and punishable under Title 18, United States Code, Section 1951(a).

COUNT FOUR

The Grand Jury further charges that:

On or about October 28, 2018, in the City of St. Louis, within the Eastern District of Missouri,

JERMEL RUSH,

the defendant herein, did obstruct, delay, or affect commerce or the movement of any article or commodity in commerce or attempt to do so by robbery of the Family Dollar at 5010 Enright Ave., St. Louis, Missouri, 63108, a commercial establishment engaged in interstate or foreign commerce and in the business of buying and selling articles and commodities that have been previously transported in interstate or foreign commerce.

In violation of Title 18, United States Code, Section 1951(a) and (b), and punishable under Title 18, United States Code, Section 1951(a).

COUNT FIVE

The Grand Jury further charges that:

On or about October 30, 2018, in the City of St. Louis, within the Eastern District of Missouri,

JERMEL RUSH,

the defendant herein, did obstruct, delay, or affect commerce or the movement of any article or commodity in commerce or attempt to do so by robbery of the City Gear Store at 1403 N. Grand, St. Louis, Missouri, 63113, a commercial establishment engaged in interstate or foreign commerce and in the business of buying and selling articles and commodities that have been previously transported in interstate or foreign commerce.

In violation of Title 18, United States Code, Section 1951(a) and (b), and punishable under Title 18, United States Code, Section 1951(a).

COUNT SIX

The Grand Jury further charges that:

On or about November 8, 2018, in the City of St. Louis, within the Eastern District of Missouri,

JERMEL RUSH,

the defendant herein, did obstruct, delay, or affect commerce or the movement of any article or commodity in commerce or attempt to do so by robbery of the National Rent to Own located at 334 N. Sarah, St. Louis, Missouri, 63108, a commercial establishment engaged in interstate or foreign commerce and in the business of buying and selling articles and commodities that have been previously transported in interstate or foreign commerce.

In violation of Title 18, United States Code, Section 1951(a) and (b), and punishable under Title 18, United States Code, Section 1951(a).

COUNT SEVEN

The Grand Jury further charges that:

On or about November 8, 2018, in the City of St. Louis, within the Eastern District of Missouri,

JERMEL RUSH,

the Defendant herein, during and in relation to a crime of violence, namely, the robbery of National Rent to Own as set forth above in Count Six, did use or carry a firearm or in furtherance of that crime of violence did possess a firearm and did brandish one or more firearms.

In violation of Title 18, United States Code, Section 924(c)(1) and (c)(3), and punishable under Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT EIGHT

The Grand Jury further charges that:

On or about November 14, 2018, in the City of St. Louis, within the Eastern District of Missouri,

JERMEL RUSH,

the defendant herein, did obstruct, delay, or affect commerce or the movement of any article or commodity in commerce or attempt to do so by robbery of the Metro PCS located at 4940 Delmar, St. Louis, Missouri, 63108, a commercial establishment engaged in interstate or foreign commerce and in the business of buying and selling articles and commodities that have been previously transported in interstate or foreign commerce.

In violation of Title 18, United States Code, Section 1951(a) and (b), and punishable under Title 18, United States Code, Section 1951(a).

COUNT NINE

The Grand Jury further charges that:

On or about November 14, 2018, in the City of St. Louis, within the Eastern District of Missouri,

JERMEL RUSH,

the Defendant herein, during and in relation to a crime of violence, namely, the robbery of the Metro PCS as set forth above in Count Eight, did use or carry a firearm or in furtherance of that crime of violence did possess a firearm and did brandish one or more firearms.

In violation of Title 18, United States Code, Section 924(c)(1) and (c)(3), and punishable under Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT TEN

The Grand Jury further charges that:

On or about November 15, 2018, in the City of St. Louis, within the Eastern District of Missouri,

JERMEL RUSH,

the defendant herein, did obstruct, delay, or affect commerce or the movement of any article or commodity in commerce or attempt to do so by robbery of the Family Dollar located at 3731 Dr. Martin Luther King, St. Louis, Missouri, 63113, a commercial establishment engaged in interstate or foreign commerce and in the business of buying and selling articles and commodities that have been previously transported in interstate or foreign commerce.

In violation of Title 18, United States Code, Section 1951(a) and (b), and punishable under Title 18, United States Code, Section 1951(a).

COUNT ELEVEN

The Grand Jury further charges that:

On or about November 15, 2018, in the City of St. Louis, within the Eastern District of Missouri,

JERMEL RUSH,

the Defendant herein, during and in relation to a crime of violence, namely, the robbery of Family Dollar as set forth above in Count Ten, did use or carry a firearm or in furtherance of that crime of violence did possess a firearm and did brandish one or more firearms.

In violation of Title 18, United States Code, Section 924(c)(1) and (c)(3), and punishable under Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT TWELVE

The Grand Jury further charges that:

On or about November 17, 2018, in the City of St. Louis, within the Eastern District of Missouri, the defendant,

JERMEL RUSH,

having been previously convicted in a court of a crime punishable by imprisonment for a term exceeding one year, did knowingly and intentionally possess a firearm, which had been transported in interstate or foreign commerce prior to or during defendant's possession of same.

In violation of Title 18, United States Code, Section 922(g) and punishable under Title 18, United States Code, Section 924(a)(2).

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Section 924(c) as set forth in Count XI, the defendant shall forfeit to the United States of America any firearm or ammunition involved in or used in those offenses.
2. Subject to forfeiture is a sum of money equal the total value of any property, real or personal involved in transactions or attempted transactions in furtherance of the offense charged in Count XI.
3. If any of the property described above, as a result of any act or omission of the defendant:
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of the court;
 - d. has been substantially diminished in value; or

- e. has been commingled with other property which cannot be divided without difficulty, the United States of America will be entitled to the forfeiture of substitute property pursuant to 21 U.S.C. 853(p).

A TRUE BILL.

FOREPERSON

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EDWARD L. DOWD III #61909MO
Assistant United States Attorney